

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF EMERALD
PASTURE DESIGNATED ACTIVITY
COMPANY, EMERALD MOOR
DESIGNATED ACTIVITY COMPANY,
AND TRINITY INVESTMENTS
DESIGNATED ACTIVITY COMPANY
FOR AN ORDER TO CONDUCT
DISCOVERY FOR USE IN FOREIGN
PROCEEDINGS PURSUANT TO 28
U.S.C. § 1782

Case No. 21-MC _____

**APPLICATION AND PETITION FOR AN ORDER TO CONDUCT DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

Petitioners Emerald Pasture Designated Activity Company, Emerald Moor Designated Activity Company, and Trinity Investments Designated Activity Company (collectively, “Petitioners”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit 1 to the Declaration of Lucas Bento dated June 21, 2021 (the “Bento Declaration”) authorizing Petitioners to conduct discovery for use in civil proceedings in the United Kingdom in the form of the subpoenas attached as Exhibit 2 to the Bento Declaration. In support of its application and petition, Petitioners submit a Memorandum of Law and attach the Declaration of Richard East dated June 23, 2021, and the Bento Declaration.

Dated: June 23, 2021

Respectfully submitted,

/s/ Peter Calamari

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